

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

Case No. 2:23-cv-01495-JHC

**STIPULATED MOTION AND
ORDER TO SEAL PORTIONS OF
THE PARTIES' LCR 37 JOINT
SUBMISSION AND CERTAIN
EXHIBITS**

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below, permanently sealing portions of the parties' LCR 37 Joint Submission, ECF Nos. 419 (redacted submission), 421 (sealed submission), and accompanying exhibits, ECF No. 422 (sealed exhibits).

In support of this request, the parties represent the following to the Court:

1. On February 20, 2025, this Court entered an Order Regarding Sealing Issues, ECF No. 418, permitting the parties to utilize a sealing procedure set forth in the Court's October 28, 2024 Order, ECF No. 320, for their LCR 37 Joint Submission filed

1 on February 20, 2025, ECF No. 419. The October 28, 2024 Order provides a
2 mechanism by which the parties may provisionally submit documents under seal
3 followed by a later omnibus motion to seal.

4 2. On February 20, 2025, Amazon provisionally filed under seal portions of the LCR 37
5 Joint Submission, ECF No. 419 (redacted submission), and five company business
6 documents, ECF No. 422 (sealed Exhibits 3-7).

7 3. Pursuant to Local Civil Rule 5(g)(3)(A), undersigned counsel certify that they met and
8 conferred to reach the agreement described in this Stipulated Motion. The following
9 attorneys, among others, conferred by phone and email on February 27, 2025, March 3,
10 2025, and March 4, 2025: Michael Baker and Shira Steinberg for the FTC; and Kristen
11 DeWilde and Katherine Trefz for Amazon.

12 4. Amazon is filing a public version of the LCR 37 Joint Submission redacting only
13 identifying names and titles of Amazon employees. This information reflects sensitive,
14 identifying information in a non-dispositive motion. *See Benshoof v. Ferguson*, 2024
15 WL 5074945, at *1 (W.D. Wash. Dec. 10, 2024) (Chun, J.) (granting motion to seal
16 personal address which was unrelated to the merits of the case); *Gnassi v. del Toro*,
17 2022 WL 3867376, at *3 (W.D. Wash. Aug. 30, 2022) (Chun, J.) (granting motion to
18 seal third-party names to protect their privacy interests).

19 5. The five sealed exhibits accompanying the LCR 37 Joint Submission, ECF No. 422,
20 consist of Amazon business documents produced in this litigation and designated under
21 the February 13, 2024 Protective Order in this case, ECF No. 160, and contain
22 confidential business information and sensitive, identifying information unnecessary to
23 the Court's determination of the parties' LCR 37 Joint Submission.

1 6. The parties stipulate as follows, subject to Court approval, and jointly request that the
2 Court enter the following Order approving this Stipulation:

- 3 a. only the highlighted portions in the redacted LCR 37 Joint Submission
4 reflecting identifying names and titles will remain sealed; and
5 b. the five Amazon company business documents attached as exhibits to the
6 LCR 37 Joint Submission, ECF No. 422, will remain sealed.

1 Stipulated to and respectfully submitted this 6th day of March, 2025.

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ORDER

IT IS SO ORDERED.

DATED this 6th day of March, 2025.

A handwritten signature in black ink, reading "John H. Chun", is written over a horizontal line.

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE